

James E. Peacock Tel 214.665.3785 Fax 214.665.3601 James.Peacock@gtlaw.com

December 17, 2024

VIA ECF FILING

Hon. John L. Sinatra, Jr.
United States District Court for the Western District of New York
Niagara Square
Buffalo, NY 14202

Re: United States of America ex rel. Deborah Conrad v. Rochester Regional Health and United Memorial Medical Center, Case No. 1:23-cv-00438-JLS

Judge Sinatra:

I am writing to request leave to exceed the twenty-five-page limit for the Memorandum of Law which Defendants plan on filing in support of their Motion to Dismiss in the above case.

The Amended Complaint in this matter is one-hundred and thirty-eight pages long. The Amended Complaint contains approximately forty pages of substantive allegations, twenty-six exhibits and six claims, all of which must be addressed in the Motion to Dismiss. It is clear to the undersigned that twenty-five pages will be insufficient to address the issues raised by the Amended Complaint. Defendants therefore request that they be able to file a Memorandum of Law of up to forty (40) pages. Earlier today, my firm conferred with Counsel for Relator, who indicated no opposition to the requested relief.

Thank you for your attention to this request.

Sincerely,

James E. Peacock

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